

Dear FCC:

I am responding with my comments on the Request for Proposed Rulemaking for Low Power FM radio stations, not as a technician or potential operator, but as a listener. I support the concept of LPFM stations.

I am a State worker and community poet and I enjoy listening to the college FM stations in my area, particularly WRPI, Troy and WCDB, @ SUNY Albany. I like these stations because of the eclectic variety of programming they present and because of the service they provide to the community by announcing events that the large commercial stations ignore.

In contrast, the large commercial stations (and, by the way, there doesn't seem to be any small commercial stations anymore) all seem to play the same type of music and their news and commentary programs all deal with the same subjects. In my own field of interest, poetry, the college stations will occasionally present poetry programs, either recorded or live readings, while the commercial stations never do. I think that low power FM stations, as presented in the NPRM, will do even more of what the college stations currently do and be able to present unique programming to the local neighborhoods they will serve.

While I am not familiar with all the technical requirements described in the NPRM, it seems that the proposed 1000-watt and 100-watt stations are useful categories for people or organizations of different means and different community needs. I also think that the 1 to 10-watt station proposal is a good idea, particularly for the the more compact communities, such as might be found at a school or in housing projects. These smaller stations could in fact most directly serve their local community needs and would be, I imagine, cheaper to operate. I suggest that the rules also allow some provisions for the lower power stations to upgrade or move up in category as opportunity permits and as their operators become more experienced. In fact, the 1 to 10-watt category could be used as a training or probationary category.

In general I would agree that as the power category of the station increases, the more rules that are applicable, but even the LP 1000 stations should not be under the same requirements as the full-power broadcasters. More power means more responsibility.

I don't think the source of revenue should be an issue for LPFM stations, except that a way should be devised to keep the commercial stations' corporations from taking over the LPFM stations, perhaps by limiting licensees to only one LPFM station and prohibiting commercial stations from owning an LPFM station. Educational institutions may be ideal licensees, but the stations should also be available to other community organizations or even community minded individuals; in fact, a large factory or industrial plant could have its own LPFM station for its workers. Any questions or disputes about community support or service could be resolved through community hearings.

I would hope that the technicians would be able to work out the requirements for preventing interference, although even now interference does occur at times. However, I find that most of the interference comes from the large commercial stations with their powerful signals. Ultimately, the broadcast spectrum, whether the current system or any future systems, such as digital, should not belong to the highest bidder and should always be at the service of the local community. Since the current commercial stations in the broadcast industry control such a

large portion of the airways, there can be only minimal •harm• to current stations from LPFM stations.

Finally, I think the FCC should begin the licensing process for LPFM stations with a •clean slate•. That is, previously unlicensed broadcasters should not be penalized for any past FCC or other legal actions against them, including those who in the past continued to operate after FCC action. One of the reasons this very NPRM is before us now is that unlicensed broadcasters have demonstrated the need for such stations. The unlicensed broadcasters have already suffered financial and legal penalties under the old rules, so to be denied a license to do what they have already demonstrated they can do (i.e., operate a station) would amount to •double jeopardy• and be unjust to those who have made these changes possible. Obviously, violation of the new rules, when promulgated, should be dealt with appropriately.

Thank you for the opportunity to comment.

Sincerely yours,

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